

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

COMMUNITY ASSOCIATIONS
INSTITUTE, *et al.*,

Plaintiffs,

v.

JANET YELLEN,
Secretary of the United States
Department of the Treasury, *et al.*,

Defendants.

Case No. 1:24cv1597 (MSN/LRV)

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Local Rule 7, Defendants hereby submit this Consent Motion for Extension of Time to Respond to Plaintiffs' Motion for Preliminary Injunction. The good cause for this relief is set forth below.

1. Plaintiffs filed their Complaint on September 10, 2024. *See* Dkt. 1. The Complaint contains 187 paragraphs in support of eight claims for relief brought under the Administrative Procedure Act ("APA") and various Constitutional provisions. Plaintiffs generally allege that community associations should be exempt from the Corporate Transparency Act, 31 U.S.C. § 5336 ("CTA"); that the CTA violates the Constitution; and that the Department of the Treasury violated the APA's notice and comment rulemaking provisions.

2. Along with the Complaint, Plaintiffs filed a Motion for Preliminary Injunction (Dkt. 13), in which they seek to enjoin enforcement of the CTA against member organizations of Plaintiff Community Associations Institute.

3. Plaintiffs noticed the Motion for Preliminary Injunction for a hearing on October 11, 2024. Dkt. 15.

4. Plaintiffs' brief in support of their Motion for Preliminary Injunction is 45 pages long, 15 pages longer than permitted by the local rules of this Court. Dkt. 14; E.D. Va. Local Civil Rule 7(F)(3). Accordingly, Plaintiffs also filed a motion to exceed the page limitations.¹ Dkt. 12.

5. Defendants were served with the Complaint and Motion for Preliminary Injunction on September 12, 2024. Defendants' response to the Motion for Preliminary Injunction is therefore due on September 26, 2024.

6. In light of the lengthy brief Plaintiffs have filed and the numerous issues raised in the Complaint, Defendants request a short extension of their time to respond to the Motion for Preliminary Injunction, to October 2, 2024. This extension should not affect the hearing on the motion currently set for October 11, 2024.

7. Plaintiffs consent to the relief requested herein.

8. A proposed order is attached for the convenience of the Court.

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¹ Defendants take no position on Plaintiffs' request to exceed the page limitations. However, should that motion be granted, Defendants request that they similarly be allotted 15 additional pages.

Dated: September 13, 2024

Respectfully submitted,

JESSICA D. ABER
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